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Attorneys for Defendant  
SMITH'S FOOD & DRUG CENTERS, INC.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

QUINTNEY MARTIN, an individual,

Plaintiff,

vs.

SMITH'S FOOD & DRUG CENTERS, INC.  
d/b/a SMITH'S FOOD AND DRUG, a foreign  
corporation; DOES I through X; and ROE  
ENTITIES I through X,

Defendants.

Case No. 2:22-cv-00833-APG-DJA

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND TIME TO FILE  
RESPONSE TO PLAINTIFF'S MOTION  
FOR SANCTIONS**

**[FIRST REQUEST]**

**IT IS HEREBY STIPULATED** by and between Plaintiff QUINTNEY MARTIN (hereinafter "Plaintiff") and Defendant SMITH'S FOOD & DRUG CENTERS, INC. (hereinafter "SMITH'S"), by and through their respective counsel of record, that the deadline for SMITH'S to respond to Plaintiff's Motion for Sanctions (ECF No. 63 (Mar. 1, 2024)) be extended by seven (7) days, as set forth below, to allow the involved Parties to properly address the issues before them. This is the first such request to extend time pertaining to the Motion for Sanctions. This Stipulation is entered into and made pursuant to LR IA 6-1 and LR 7-1.

Specifically, counsel for SMITH'S is unavailable and will be out of town, so he will not have the opportunity to address and thereafter timely respond to Plaintiff's subject Motion. The Parties have agreed that the date to respond be moved one week, to March 22, 2024.

There have been no stipulations or other extensions of time requested in regard to the instant motion practice. The extension is sought in order to allow the Parties sufficient time to address all issues

1 contained in Plaintiff's Motion. This request for additional time is sought in a timely manner, as the  
2 deadline for SMITH'S to respond to Plaintiff's Motion is on March 15, 2024, and, therefore, has not yet  
3 passed.

4 **IT IS SO STIPULATED.**

5 DATED this 6th day of March, 2024.  
6 **TANNER LAW FIRM**

7 */s/ Jeffrey Gunn*

8 DAVID A. TANNER, ESQ.  
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9 JEFFREY C. GUNN, ESQ.  
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12 *Attorneys for Plaintiff*  
13 *Quintney Martin*

DATED this 6th day of March, 2024.  
**COOPER LEVENSON, P.A.**

*/s/ Pooja Kumar*

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*Smith's Food & Drug Centers, Inc.*

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17 **IT IS SO ORDERED.**

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20 **UNITED STATES MAGISTRATE JUDGE**

21 **DATE:** 3/7/2024  
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